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8 UNITED STATES BANKRUPTCY COURT
9 NORTHERN DISTRICT OF CALIFORNIA

10 IN RE:
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LEGAL RECOVERY, LLC
Debtor
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Case No.: 24-30074 DM
Chapter 11

STATUS CONFERENCE STATEMENT AND
RESPONSE TO ORDER TO SHOW CAUSE

Date: May 31, 2024
Time: 10:00 a.m.
Via Tele/Video Conference
www.canb.uscourts.gov/calendar

Debtor Legal Recovery LLC, for its Status Conference Statement and response to order to show cause for dismissal, states as follows:

1. Debtor filed its status conference statement on May 13 for the May 17 status conference, but its attorney, Leeds Disston, inadvertently did not appear without intent to cause dismissal of the case.
2. Debtor has completed the 341 creditor meeting on May 16.
3. Debtor has filed the Subchapter V plan on May 6. The largest secured creditor, US Bank through its counsel, has indicated that it will provide response to the proposed plan. Debtor is working toward an agreement with the creditor and will set confirmation hearing as soon as practicable.
4. As to the Lombard Street Property, the unlawful detainer action [SF Case no. CUD-24-674202] is pending to remove Martin Eng and other unauthorized occupants. Debtor is working diligently to bring a resolution to the case which may have a material effect on the plan.

- 1 5. Debtor is uncertain if the Lombard Street Property has current insurance coverage, but
2 anyhow, Debtor has retained an insurance broker to obtain property insurance and has
3 submitted requests to insurance carriers on May 21. Debtor is awaiting responses.
4 6. Unsecured creditors have filed claims which debtor has filed objections to with
5 opportunity for hearing. There are three adversary proceedings by unsecured creditors.
6 Debtor has moved to dismiss two with hearing set for June 21. As to the adversary
7 proceeding by Joanne Eng, Debtor is considering its options and may move to remand
8 the matter to state court. The proposed plan does not anticipate any disbursements to
9 unsecured claims, whether contested or not.
10 7. Debtor has filed an amended Employment Application for its counsel.
11 8. Debtor has timely filed all monthly operating reports.

12 May 28, 2024
13 /s/ Leeds Disston
14 Attorney for Legal Recovery LLC